

ORIGINAL

Robert E. Sabido, OSB No. 96416  
[rsabido@cvk-law.com](mailto:rsabido@cvk-law.com)  
COSGRAVE VERGEER KESTER LLP  
805 SW Broadway, 8th Floor  
Portland, Oregon 97205  
Telephone: (503) 323-9000  
Facsimile: (503) 323-9019

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Attorney for Defendant Hillcrest Davidson & Associates LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

ROBERT BLALOCK

Plaintiff,

v.

MAXIMUM SECURITY ALARM INC. aka  
MAXIMUM SECURITY; and HILLCREST  
DAVIDSON & ASSOCIATES LLC

Defendants.

Case No. **CV'11 - 720 MO**

**NOTICE OF REMOVAL OF ACTION  
UNDER 28 U.S.C. § 1441(b)**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT defendant Hillcrest Davidson & Associates LLC ("Hillcrest") hereby removes to this court the state court action described below.

1. This is a civil action over which this court has original jurisdiction under 28 U.S.C. § 1331, and is an action that may be removed to this court pursuant to 28 U.S.C. § 1441(b), because it asserts a claim under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* Additionally, the court has supplemental jurisdiction, under 28 U.S.C. § 1441(c), over the other claims alleged in the action.

2. On or about April 11, 2011, the action was commenced in Oregon Circuit Court, Multnomah County, case number 1104-04734. A copy of the First Amended Complaint is attached as Exhibit A.

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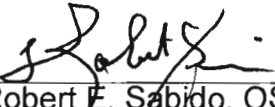
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3. This removal is timely because the first date on which any defendant received a copy of the complaint was May 17, 2011, when Hillcrest was served with the summons and complaint. A copy of the Summons is attached as Exhibit B.

4. Defendant Maximum Security Alarm Inc. consents to this removal. See Exhibit C.

DATED: June 15, 2011

COSGRAVE VERGEER KESTER LLP

  
Robert E. Sabido, OSB No. 96416  
Telephone: (503) 323-9000  
Fax: (503) 323-9019  
E-mail: [rsabido@cvk-law.com](mailto:rsabido@cvk-law.com)

Attorney for Defendant Hillcrest Davidson &  
Associates

### CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441(b)** on the date indicated below by:

- ☒ mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- ☐ hand delivery,
- ☐ facsimile transmission,
- ☐ overnight delivery,
- ☐ electronic filing notification;

I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address(es) listed below:

Bret Knewtson  
3000 NW Stucki Place, Suite 230-M  
Hillsboro, OR 97124  
Attorney for Plaintiff

DATED: June 15, 2011

  
Robert E. Sabido